

From: "Matt Stock" <mstock@jzplaw.com>  
To: "Ebright, Stephanie" <EBRIGHT.STEPHANIE@EPA.GOV>  
CC: "Cora, Lori" <Cora.Lori@epa.gov>  
"Zhen, Davis" <Zhen.Davis@epa.gov>  
"Ingemansen, Dean" <Ingemansen.Dean@epa.gov>  
"Sheldrake, Sean" <sheldrake.sean@epa.gov>  
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"Young, Hunter" <Young.Hunter@epa.gov>

Date: 8/23/2019 12:25:51 PM

Subject: RE: Portland Harbor Superfund Site - River Mile 7W Remedial Design

Attachments: [Arkema\\_Remedial\\_Design\\_Area.pdf](#)

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Hi Stephanie,

Thanks for sending back the SOW. It appears that we still have a couple of loose ends to discuss, in particular the language regarding riverbanks and the designation of a DEQ project manager. Should we try to set up a conference call to go over those? If so, I can coordinate with LSS and propose some dates/times that work. Also, I've attached a map that demarcates the project areas, as we currently understand them.

With regard to the ASAOC, Jim and I would like to set up a brief call with you to provide you with some updates. Are you available this afternoon between 1:00 and 2:00? I realize this is a short window. Alternatively, we could set something up for Monday morning.

Thanks,  
Matt

Matthew J. Stock  
JOYCE ZIKER PARKINSON, PLLC  
Direct: (206) 957-5955

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**From:** Ebright, Stephanie [mailto:EBRIGHT.STEPHANIE@EPA.GOV]  
**Sent:** Tuesday, August 20, 2019 11:16 AM  
**To:** Matt Stock <mstock@jzplaw.com>  
**Cc:** Cora, Lori <Cora.Lori@epa.gov>; Zhen, Davis <Zhen.Davis@epa.gov>; Ingemansen, Dean <Ingemansen.Dean@epa.gov>; Sheldrake, Sean <sheldrake.sean@epa.gov>; karen.traeger@external.total.com; doug.loutzenhiser@total.com; jkincaid@cablehouston.com; dmoran@pedersenhoupt.com; michael.pinto@total.com; Young, Hunter <Young.Hunter@epa.gov>  
**Subject:** RE: Portland Harbor Superfund Site - River Mile 7W Remedial Design

Hi Matt,

Thanks for sending the redline edits to the SOW. Attached are EPA's responses to the proposed redline revisions. Also attached is a draft SOW for Bayer based on Arkema's document. Please fill in the relevant river miles for the Bayer project area. Also, please provide a project area map to attach to the ASAOC that outlines each project area.

We look forward to receiving a redline ASAOC this week.

Thanks and please feel free to contact me with any questions on the attached documents.

Stephanie

Stephanie Ebright, Assistant Regional Counsel  
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**From:** Matt Stock <[mstock@jzplaw.com](mailto:mstock@jzplaw.com)>  
**Sent:** Wednesday, August 07, 2019 4:35 PM  
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**Subject:** RE: Portland Harbor Superfund Site - River Mile 7W Remedial Design

Hi Stephanie –

On behalf of Legacy Site Services LLC, agent for Arkema Inc., I've attached our most recent proposed revisions to the amended model SOW for the Arkema Project Area. I'm sending these to you in two versions. The first includes our proposed revisions over the redlines that have been previously exchanged. The second ("RLSO against EPA edits") is a comparison against the version that you sent on July 23, such that only our most recent changes are visible in redline. Because of this document's formatting (where all changes default to a generic "Author" when the document is saved), we felt that this second version might be useful in quickly isolating and identifying our most recent proposed changes.

These edits track the discussions that we had on July 29. That said, if you have any questions or would like to discuss these edits further, please let me know.

Regards,  
Matt

Matthew J. Stock  
JOYCE ZIKER PARKINSON, PLLC  
Direct: (206) 957-5955

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**From:** Ebright, Stephanie [<mailto:EBRIGHT.STEPHANIE@EPA.GOV>]  
**Sent:** Tuesday, July 23, 2019 9:55 PM  
**To:** Matt Stock <[mstock@jzplaw.com](mailto:mstock@jzplaw.com)>  
**Cc:** Cora, Lori <[Cora.Lori@epa.gov](mailto:Cora.Lori@epa.gov)>; Zhen, Davis <[Zhen.Davis@epa.gov](mailto:Zhen.Davis@epa.gov)>; Mairs, Stephanie <[Mairs.Stephanie@epa.gov](mailto:Mairs.Stephanie@epa.gov)>; Ingemansen, Dean <[Ingemansen.Dean@epa.gov](mailto:Ingemansen.Dean@epa.gov)>; Sheldrake, Sean <[sheldrake.sean@epa.gov](mailto:sheldrake.sean@epa.gov)>; [karen.traeger@external.total.com](mailto:karen.traeger@external.total.com); [doug.loutzenhiser@total.com](mailto:doug.loutzenhiser@total.com); [jkincaid@cablehouston.com](mailto:jkincaid@cablehouston.com); [dmoran@pedersenhoupt.com](mailto:dmoran@pedersenhoupt.com); [michael.pinto@total.com](mailto:michael.pinto@total.com)  
**Subject:** RE: Portland Harbor Superfund Site - River Mile 7W Remedial Design

Thanks Matt for providing Arkema's redline changes.

For our discussion next Monday, please see EPA's redline responses to Arkema's edits. We can discuss these edits, including the City/State funding and disbursement terms, when we talk.

If you have any questions before Monday, please don't hesitate to give me a call.

Stephanie Ebright, Assistant Regional Counsel  
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**From:** Matt Stock <[mstock@jzplaw.com](mailto:mstock@jzplaw.com)>

**Sent:** Friday, July 12, 2019 2:39 PM

**To:** Ebright, Stephanie <[EBRIGHT.STEPHANIE@EPA.GOV](mailto:EBRIGHT.STEPHANIE@EPA.GOV)>

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**Subject:** RE: Portland Harbor Superfund Site - River Mile 7W Remedial Design

Hi Stephanie,

I've attached Legacy Site Services LLC's (agent for Arkema Inc.) proposed revisions to the amended model ASAO and amended model SOW, which relates specifically to that portion of the River Mile 7 West Project Area for which Arkema would perform RD. I understand that Bayer CropScience, with whom we are continuing to coordinate on the proposed RD work for the River Mile 7 West Project Area, is still reviewing the amended model ASAO (including our proposed revisions) and amended model SOW for its portion of the River Mile 7 West Project Area and will be providing you with any further revisions separately. Bayer CropScience's outside counsel is copied on this email.

I have also attached proposed disbursement terms. In creating these, I took the model disbursement terms previously provided by Dean (which were taken from the EPA's model RD/RA consent decree) and worked to align them with the provisions set forth in the City/State Settlement Agreement for Funding Remedial Design.

Please let me know if you have any questions or comments concerning any of these documents. As you will see, there are several technical issues pertaining to the statement of work that we would like to discuss with EPA and DEQ. Given the fact that my clients are located on the east coast, it would be best if we could have that discussion by conference call. If you could provide several dates and times that your team could be available, I will set up a call.

Thanks,  
Matt

Matthew J. Stock  
[JOYCE ZIKER PARKINSON, PLLC](mailto:JOYCE_ZIKER_PARKINSON@PLLC)  
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**From:** Ebright, Stephanie [<mailto:EBRIGHT.STEPHANIE@EPA.GOV>]

**Sent:** Tuesday, July 02, 2019 2:10 PM

**To:** Matt Stock <[mstock@jzplaw.com](mailto:mstock@jzplaw.com)>; [karen.traeger@external.total.com](mailto:karen.traeger@external.total.com); [doug.loutzenhiser@total.com](mailto:doug.loutzenhiser@total.com); [michael.pinto@total.com](mailto:michael.pinto@total.com); [jkincaid@cablehouston.com](mailto:jkincaid@cablehouston.com); [dmoran@pedersenhoupt.com](mailto:dmoran@pedersenhoupt.com)

**Cc:** Cora, Lori <[Cora.Lori@epa.gov](mailto:Cora.Lori@epa.gov)>; Zhen, Davis <[Zhen.Davis@epa.gov](mailto:Zhen.Davis@epa.gov)>; Mairs, Stephanie <[Mairs.Stephanie@epa.gov](mailto:Mairs.Stephanie@epa.gov)>; Ingemansen, Dean <[Ingemansen.Dean@epa.gov](mailto:Ingemansen.Dean@epa.gov)>; Hladick, Christopher <[hladick.christopher@epa.gov](mailto:hladick.christopher@epa.gov)>; Fleming, Sheila <[fleming.sheila@epa.gov](mailto:fleming.sheila@epa.gov)>

**Subject:** RE: Portland Harbor Superfund Site - River Mile 7W Remedial Design

Thanks Matt.

We appreciate this group's offer to perform Remedial Design at River Mile 7W. However, for EPA to fully evaluate your

offer, we need to receive any project area-specific revisions you are proposing to the Portland Harbor model ASAO and SOW by Friday, July 12<sup>th</sup>. Please email me any proposed revisions by that date.

Best,  
Stephanie

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**From:** Cora, Lori  
**Sent:** Friday, June 28, 2019 3:52 PM  
**To:** Ebright, Stephanie <[EBRIGHT.STEPHANIE@EPA.GOV](mailto:EBRIGHT.STEPHANIE@EPA.GOV)>; Mairs, Stephanie <[Mairs.Stephanie@epa.gov](mailto:Mairs.Stephanie@epa.gov)>  
**Subject:** FW: Portland Harbor Superfund Site - River Mile 7W Remedial Design

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**Lori Houck Cora** | Assistant Regional Counsel  
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**Subject:** Portland Harbor Superfund Site - River Mile 7W Remedial Design

Ms. Fleming,

Please see the attached letter concerning remedial design for River Mile 7W at the Portland Harbor Superfund Site. If you have any questions, please feel free to contact me.

Regards,  
Matt

Matthew J. Stock  
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